

1 AARON D. FORD  
Attorney General  
2 KEVIN A. PICK  
Senior Deputy Attorney General  
3 Nevada Bar No. 11683  
CAMERON P. VANDENBERG  
4 Chief Deputy Attorney General  
Nevada Bar No. 4356  
5 Nevada Office of the Attorney General  
5420 Kietzke Lane, Suite 202  
6 Reno, NV 89511  
(775) 687-2129 (phone)  
7 (775) 688-1822 (fax)  
Email: [kpick@ag.nv.gov](mailto:kpick@ag.nv.gov)  
8 [cvandenberg@ag.nv.gov](mailto:cvandenberg@ag.nv.gov)  
*Attorneys for Defendant, State of Nevada*  
9 *ex rel. its Department of Corrections*

10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA  
12

13 MARDELLE PETERSEN,

14 Plaintiff,

15 v.

16 THE STATE OF NEVADA, *ex rel. its*  
17 NEVADA DEPARTMENT OF  
CORRECTIONS,

18 Defendant.  
19

Case No. 3:20-cv-00201-RCJ-WGC

**STIPULATION AND ORDER**  
**EXTENDING TIME TO ANSWER OR**  
**OTHERWISE RESPOND TO**  
**PLAINTIFF'S COMPLAINT**

**(FIRST REQUEST)**

20 Defendant, State of Nevada *ex rel. its* Department of Corrections ("NDOC"), and  
21 Plaintiff, Mardelle Petersen, by and through undersigned counsel, pursuant to LR IA 6-1 and LR  
22 IA 6-2, hereby submit their Stipulation and Order Extending Time to Answer or Otherwise  
23 Respond to Plaintiff's Complaint. This is the first request for an extension of time to file an  
24 answer or otherwise respond to Plaintiff's Complaint.

25 Plaintiff, Mardelle Petersen, filed a Complaint (ECF No. 1) on April 2, 2020. Defendant  
26 was served with the Complaint on April 6, 2020, and the Attorney General was served on April  
27 8, 2020. The deadline for Defendant to answer or otherwise respond to the Complaint is April  
28 27, 2020.

1 Due to the challenges presented by the current pandemic crisis, defense counsel's pre-  
2 existing professional obligations, and Senior Deputy Attorney General Pick's previously  
3 scheduled paternity leave through April 24, 2020, Defendant needs additional time to compile  
4 information and prepare its response to the Complaint.

5 Upon agreement by and between the parties, through their respective counsel, the  
6 undersigned counsel requests that this Court grant Defendant a 30-day extension of time, up to  
7 and including, Monday, May 28, 2020, to file an answer or motion in response to Plaintiff's  
8 Complaint.

9 ///

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 By entering into this stipulation, neither party waives any rights they have under statute,  
2 law, or rule with respect to Plaintiff's Complaint.

3 DATED: April 20, 2020

4 AARON D. FORD  
5 Attorney General

6 By: /s/ Cameron Vandenberg

7 KEVIN A. PICK  
8 Senior Deputy Attorney General  
9 Nevada Bar No. 11683  
10 CAMERON P. VANDENBERG  
11 Chief Deputy Attorney General  
12 Nevada Bar No. 4356  
13 Office of the Attorney General  
14 5420 Kietzke Lane, Suite 202  
15 Reno, NV 89511  
16 (775) 687-2129 (phone)  
17 (775) 688-1822 (fax)  
18 Email: [kpick@ag.nv.gov](mailto:kpick@ag.nv.gov)  
19 [cvandenberg@ag.nv.gov](mailto:cvandenberg@ag.nv.gov)

20 *Attorneys for Defendant, State of Nevada*  
21 *ex rel. its Department of Corrections*

By: /s/ Mark Mausert

MARK MAUSER, Esq.  
Nevada Bar No. 2398  
729 Evans Avenue  
Reno, NV 89512  
(775) 786-5477 (phone)  
(775) 786-9658 (fax)

Email: [mark@markmausertlaw.com](mailto:mark@markmausertlaw.com)  
*Attorneys for Plaintiff Mardelle Petersen*

22 **ORDER**

23 IT IS SO ORDERED.

24 William G. Cobb  
25 UNITED STATES MAGISTRATE JUDGE

26 Dated: April 20, 2020  
27  
28